

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA)	
)	
Plaintiff,)	
)	No. 12 CR 109
vs)	
)	Honorable Sharon Johnson Coleman
HEON SEOK LEE)	
)	
Defendant.)	

**MOTION TO MODIFY CONDITIONS
OF PRETRIAL RELEASE TO PERMIT
EMPLOYMENT ACTIVITIES IN ILLINOIS**

Now Comes Defendant, HEON SEOK LEE, by and through his attorney, Sheppard Law Firm, P.C., and pursuant to 18 U.S.C. § 3142(c)(3), moves this Court to allow him to work at KTurbo Inc.'s factory in Batavia, Illinois, as well as to travel to equipment supplier locations within Illinois, and attend client meetings or business meetings in Illinois. In support thereof, Mr. Lee states as follows:

1. KTurbo Inc. has a factory at 1183 Pierson Drive, Unit 118, Batavia, Illinois, 60510. *See <http://kturbousa.com/index>*. KTurbo is currently manufacturing oil-free air compressors. *See id.* There are currently only two employees at the factory in Batavia, David Choi and Martin Barson.
2. As discussed at the last hearing in this cause, Mr. Lee's family resides in South Korea; they are dependent on income from KTurbo, Inc.
3. Mr. Lee is currently residing in Elk Grove Village.
4. Mr. Lee is requesting permission to leave his home at or after 5 a.m., engage in work at KTurbo's factory in Batavia, Illinois, and return home by 10 p.m..

5. If granted leave to do so, he would work seven days per week.
6. During the course of his employment, Mr. Lee may also be called upon to obtain equipment from an equipment supplier located within Illinois.
7. As CEO of KTurbo, Inc., Mr. Lee's presence at sales meetings and other business events, such as at presentations to clients, is also critical to KTurbo's success. Accordingly, he is also requesting to attend employment activities outside the factory should the need arise.
8. The Bail Reform Act lists “maintain employment” as one, of several, possible conditions “which will reasonably assure the appearance of the person as required and the safety of any other person and the community.” 18 U.S.C. 3142(c)(B)(ii).

WHEREFORE, based on the foregoing, Mr. Lee moves this Court to allow him to work at KTurbo's factory in Batavia, Illinois, whereby he would leave his home at or after 5 a.m. and return by 10 p.m., and attend other employment activities, such as travelling to equipment supplier locations and sales meetings, within the time parameters described above.

Respectfully submitted:

/s/ Adam J. Sheppard
Attorney for Defendant

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CERTIFICATE OF SERVICE

I hereby certify that the foregoing motion was served on June 29, 2016, in accordance with Fed.R.Crim.P.49, Fed.R.Civ.P.5, LR 5.5, and the General Order on Electronic Case Filing (ECF) pursuant to the district court's system as to ECF filers.

Respectfully submitted:

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